

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FT. WORTH DIVISION**

IN RE:	)	
	)	
FLEXIBLE FUNDING LTD. LIABILITY CO.,	)	
<i>et. al.,</i>	)	
	)	
Debtors.	)	
<hr style="width: 40%; margin-left: 0;"/>	)	Case No. 21-42215-11-mxm
	)	Chapter 11
FLEXIBLE FUNDING LTD. LIABILITY CO.,	)	
Plaintiff	)	Adversary Proceeding No. 24-04020-mxm
	)	
v.	)	
	)	
THE ORIGINAL MOWBRAY’S TREE	)	
SERVICE INCORPORATED,	)	
Defendant	)	
<hr style="width: 40%; margin-left: 0;"/>	)	

**JOINT MOTION TO ENTER AGREED SCHEDULING ORDER**

Plaintiff Flexible Funding Ltd. Liability Co. and Defendant The Original Mowbray’s Tree Service Incorporated (“Mowbray’s”) submit this Joint Motion to Enter Agreed Scheduling Order and respectfully represent:

On September 26, 2024, the Court held a status conference. At that status conference, counsel for Mowbray’s informed the Court that the parties would work on an agreed scheduling order to submit to the Court. The Court advised that should the parties agree on a scheduling order, the status conference continued to October 24, 2024 at 9:00 am would be taken off calendar.

The parties have conferred and have agreed to the proposed scheduling order submitted with this motion. The parties respectfully request that the Court enter the Agreed Scheduling Order proposed by the parties.

Respectfully submitted,

DATED: October 17, 2024

**SULLIVAN BLACKBURN PRATT LLP**

/s/ Christopher D. Sullivan

Christopher D. Sullivan

(Admitted *Pro Hac Vice*)

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*Counsel for Flexible Funding Ltd. Liability Co.*

DATED: October 17, 2024

**REED SMITH LLP**

/s/ Paul D. Moak (with permission)

Paul D. Moak

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*Counsel for The Original Mowbray's Tree Service  
Incorporated*

**CERTIFICATE OF SERVICE**

It is hereby certified that on October 17, 2024, a copy of the foregoing was served through the Court's electronic filing system as to all parties who have entered an appearance in this proceeding.

/s/Christopher D. Sullivan

Christopher D. Sullivan